

**FILED**

IN THE UNITED STATES DISTRICT COURT FOR THE

DEC 02 2020

WESTERN DISTRICT OF OKLAHOMA

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY WMT, DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

HENRY LEE BROWN and  
CASSY JOJON BLISS,

Defendants.

No. **CR 20-313 HE**

Violations: 21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
21 U.S.C. § 856(a)(1)  
18 U.S.C. § 924(c)(1)(A)  
18 U.S.C. § 922(g)(3)  
21 U.S.C. § 860a  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(d)  
21 U.S.C. § 853  
28 U.S.C. § 2461(c)

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT 1**

**(Conspiracy to Possess with Intent to Distribute  
and to Distribute Methamphetamine)**

From in or about May 2020, the exact date being unknown to the Grand Jury, and continuing thereafter through on or about June 23, 2020, in the Western District of Oklahoma and elsewhere,

----- **HENRY LEE BROWN and  
CASSY JOJON BLISS** -----

knowingly and intentionally conspired, combined, confederated, and agreed with others, both known and unknown to the Grand Jury, to interdependently possess with intent to

distribute and to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846, the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

**COUNT 2**  
**(Possession of Methamphetamine with Intent to Distribute)**

On or about June 23, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **HENRY LEE BROWN** -----

knowingly and intentionally possessed with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(B).

**COUNT 3**  
**(Maintaining a Drug-Involved Premises)**

From in or about June 2015, and continuing thereafter through on or about June 23, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **HENRY LEE BROWN** -----

knowingly and intentionally opened, leased, rented, used, and maintained a place at 1609 Hathaway Street, Ponca City, Oklahoma, for the purpose of using and distributing

controlled substances, including methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT 4**

**(Possession of Firearms in Furtherance of a Drug-Trafficking Crime)**

On or about June 23, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **HENRY LEE BROWN** -----

knowingly and intentionally possessed firearms, to wit:

1. a Mossberg Maverick, model 88, 12 gauge shotgun, bearing serial number MV24299M;
2. an Anderson Manufacturing, model AM-15, .223 caliber rifle, bearing serial number 19115330; and
3. a Ruger, model New Model Single Six, .22 caliber revolver, bearing serial number 59-22044,

in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, that is maintaining a drug-involved premises, as charged in Count 3.

All in violation of Title 18, United States Code, Section 924(c)(1)(A), the penalty for which is found at Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT 5**

**(Drug User in Possession of Firearms)**

On or about June 23, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **HENRY LEE BROWN,** -----

with knowledge that he was an unlawful user of methamphetamine, a controlled substance

as defined in Title 21, United States Code, Section 802, knowingly possessed firearms, to wit:

1. a Mossberg Maverick, model 88, 12 gauge shotgun, bearing serial number MV24299M;
2. an Anderson Manufacturing, model AM-15, .223 caliber rifle, bearing serial number 19115330; and
3. a Ruger, model New Model Single Six, .22 caliber revolver, bearing serial number 59-22044,

which were in and affecting interstate commerce in that the firearms had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(3), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

**COUNT 6**  
**(Possession of Methamphetamine with Intent to Distribute)**

On or about July 2, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **CASSY JOJON BLISS** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), the penalty for which is found at Title 21, United States Code, Section 841(b)(1)(A).

**COUNT 7**  
**(Maintaining a Drug-Involved Premises)**

On or about July 2, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **CASSY JOJON BLISS** -----

knowingly and intentionally opened, leased, rented, used, and maintained a place at 7901 W. Peckham Road, Newkirk, Oklahoma, for the purpose of using and distributing controlled substances, including methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT 8**  
**(Possession of Methamphetamine with Intent to Distribute  
on Premises Where a Child Was Present or Resided)**

On or about July 2, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **CASSY JOJON BLISS** -----

knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 6, on a premises in which an individual under the age of 18 years was present and resided, to wit: 7901 W. Peckham Road, Newkirk, Oklahoma.

All in violation of Title 21, United States Code, Section 860a.

**COUNT 9**

**(Possession of Firearms in Furtherance of a Drug-Trafficking Crime)**

On or about July 2, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **CASSY JOJON BLISS** -----

knowingly and intentionally possessed firearms, to wit:

1. an Arminius, model HW38, .38 caliber revolver, bearing serial number 369155;
2. a Smith and Wesson, model 15-3, .38 caliber revolver, bearing serial number 3K37973; and
3. a Springfield, model 87A, .22 caliber rifle, bearing no serial number,

in furtherance of a drug-trafficking crime for which she may be prosecuted in a court of the United States, that is possession of methamphetamine with intent to distribute, as charged in Count 6, and maintaining a drug-involved premises, as charged in Count 7.

All in violation of Title 18, United States Code, Section 924(c)(1)(A), the penalty for which is found at Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT 10**

**(Felon in Possession of Firearms)**

On or about July 2, 2020, in Kay County, Oklahoma, in the Western District of Oklahoma,

----- **CASSY JOJON BLISS**, -----

with knowledge that she had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms, to wit:

1. an Arminius, model HW38, .38 caliber revolver, bearing serial number 369155;

2. a Smith and Wesson, model 15-3, .38 caliber revolver, bearing serial number 3K37973; and

3. a Springfield, model 87A, .22 caliber rifle, bearing no serial number,

which were in and affecting interstate commerce in that said firearms had previously crossed state lines to reach the state of Oklahoma.

All in violation of Title 18, United States Code, Section 922(g)(1), the penalty for which is found at Title 18, United States Code, Section 924(a)(2).

### **FORFEITURE**

The allegations contained in this Indictment are hereby re-alleged and incorporated for the purpose of alleging forfeiture.

Upon conviction of the offenses set forth in Counts 1, 2, or 3 of this Indictment, **HENRY LEE BROWN** shall forfeit to the United States any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses.

Upon conviction of any of the offenses set forth in Counts 1, 2, 3, 4, or 5 of this Indictment, **HENRY LEE BROWN** shall forfeit to the United States any firearms and ammunition involved in the commission of such offense(s).

The property subject to forfeiture includes, but is not limited to:

1. Real Property located at 1609 Hathaway Street, Ponca City, Oklahoma;

2. a Mossberg Maverick, model 88, 12 gauge shotgun, bearing serial number MV24299M;

3. an Anderson Manufacturing, model AM-15, .223 caliber rifle, bearing serial number 19115330;
4. a Ruger, model New Model Single Six, .22 caliber revolver, bearing serial number 59-22044; and
5. any and all ammunition and magazines not specifically listed.

Upon conviction of the offenses set forth in Counts 1, 6, 7, or 8 of this Indictment, **CASSY JOJON BLISS** shall forfeit to the United States any property constituting or derived from any proceeds obtained directly or indirectly as a result of such offenses, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such offenses.

Upon conviction of any of the offenses set forth in Counts 1, 6, 7, 8, 9, or 10 of this Indictment, **CASSY JOJON BLISS** shall forfeit to the United States any firearms and ammunition involved in the commission of such offense(s).

The property subject to forfeiture includes, but is not limited to:

1. approximately \$8,256.00 in U.S. currency;
2. an Arminius, model HW38, .38 caliber revolver, bearing serial number 369155;
3. a Smith and Wesson, model 15-3, .38 caliber revolver, bearing serial number 3K37973;
4. a Springfield, model 87A, .22 caliber rifle, bearing no serial number;
5. a Ruger, model LC9, 9mm pistol, bearing serial number 453-58867;
6. a J. Steven's Arms, model 620, 12 gauge shotgun with stock sawed off, bearing serial number 25213;
7. a Winchester, model 1897, 12 gauge shotgun, bearing serial number 514499;



8. a Bushmaster, model XM-15 kn, .223-5.56mm AR-15 rifle, bearing serial number L209133;
9. a Mossberg Maverick, model 88, 12 gauge shotgun, bearing serial number MV71143S;
10. an Ithaca, model 37, 20 gauge shotgun, bearing serial number 392704; and
11. any and all ammunition and magazines not specifically listed.

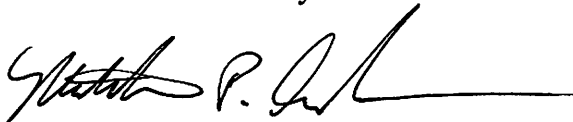
All pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

A handwritten signature in black ink, appearing to read "Brenda Diersey".

FOREPERSON OF THE GRAND JURY

TIMOTHY J. DOWNING  
United States Attorney

A handwritten signature in black ink, appearing to read "Matthew P. Anderson".

MATTHEW P. ANDERSON  
Assistant United States Attorney